

as a defendant in the above-entitled action at the time responses to these document requests are served.

3. The term “Producer” shall mean any person or entity that manufactures Polyurethane Foam for sale to Customers.

4. The term “Relevant Period” means the period from January 1, 1994 though the present.

5. The terms “You” or “Your” means deponent Bruce Schneider, individually and in his capacity as an employee of Defendant Future Foam, Inc.

INSTRUCTIONS

In addition to the requirements set forth in the Federal Rules of Civil Procedure, which Plaintiffs incorporate herein, Plaintiffs incorporate by reference the Instructions from their Joint First Set of Requests for Production to Defendants (“Instructions”), and the Order Regarding Discovery Protocols entered by the Court on September 15, 2011. To the extent that there are any inconsistencies between the Instructions and the Discovery Protocol, they shall be resolved in favor of the Discovery Protocol.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request No. 1

All YOUR expense and travel records and reports during the RELEVANT PERIOD.

Request No. 2

All YOUR cellular, personal telephone, business telephone and other telephone bills during the RELEVANT PERIOD in YOUR possession, custody or control.

Request No. 3.

All YOUR e-mails, text messages, voice messages and/or transcripts of conversations by, between or among YOU and any DEFENDANT or PRODUCER

during the RELEVANT PRIOD.

Dated: April 22, 2014

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